

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 3105

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION
GRANTING ADAM HERRERA RELIEF FROM THE AUTOMATIC
STAY TO PROCEED IN CIVIL ACTION**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On August 26, 2025, Adam Herrera, (the “**Movant**”) filed *Adam Herrera’s Motion for Relief from Stay* [D.I. 3105] (the “**Herrera Lift Stay Motion**”) in the United States Bankruptcy Court for the District of Delaware (the “**Court**”).
2. The Debtors and the Movant have engaged in good faith negotiations and have agreed to enter into a stipulation (the “**Stipulation**”) to lift the automatic stay and resolve the Herrera Lift Stay Motion.²
3. A copy of the Stipulation is attached as Exhibit A to the proposed form of order (the “**Proposed Order**”), attached hereto as Exhibit 1.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

4. Counsel for the Movant has reviewed the Proposed Order and has agreed to its entry.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit 1**, at its earliest convenience.

Dated: September 30, 2025
Wilmington, Delaware

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